

**THE UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ETONIA CARTER, an individual,)	
)	
Plaintiff,)	Case No.
)	
v.)	
)	
MINOOKA COMMUNITY CONSOLIDATED)	
SCHOOL DISTRICT 201,)	
)	
Defendant.)	

COMPLAINT

NOW COMES the Plaintiff, ETONIA CARTER, by and through her attorney, S.T. LEGAL GROUP, who for her Complaint against Defendant, MINOOKA COMMUNITY CONSOLIDATED SCHOOL DISTRICT 201, alleges and states as follows:

NATURE OF ACTION

1. This lawsuit arises under Title VII of the Civil Rights Act of 1964 for discrimination based on race.

JURISDICTION

2. Federal jurisdiction arises under the provisions of the Civil Rights Act of 1964 Sec. 703 (a)(1) and federal question jurisdiction under 28 U.S.C. § 1331 and § 1343.

VENUE

3. Pursuant to 29 U.S.C. § 1391, venue lies in the Northern District of Illinois in that Plaintiff is a resident in this District, the Defendant is a public entity engaged in a school district in this District, and a substantial part of the alleged events or omissions giving rise to the claims occurred in this District.

PARTIES

4. At all relevant times, the Plaintiff, ETONIA CARTER (“Ms. Carter”), was a resident of Joliet, State of Illinois.

5. At all relevant times, the Defendant, MINOOKA COMMUNITY CONSOLIDATED SCHOOL DISTRICT 201 (“District 201”) was an Illinois Public School District organized and operating pursuant to the *Illinois School Code*, 105 ILCS 5/1-1 *et seq.*

BACKGROUND

6. District 201 includes grades Pre-K through 8th.

7. District 201 educates students in seven (7) school buildings: Minooka Primary Center (Pre-K-2); Walnut Trails Elementary School (K-4); Minooka Elementary School (K-4); Jones Elementary School (K-4); Aux Sable Elementary School (K-4); Minooka Intermediate School (5-6); and Minooka Junior High School (7-8).

8. At all relevant times, Plaintiff, Ms. Carter, lived within the boundaries of District 201, and had three (3) children attending school in DISTRICT 201.

9. In or around February 2017 the Plaintiff, Ms. Carter, began her employment as a substitute teacher with the Defendant, District 201.

10. Ms. Carter performed all the terms, conditions, and requirements of her job in a satisfactory manner.

11. Upon information and belief, at all times relevant hereto, Ms. Carter was one (1) of only two (2) African American teachers or substitute teachers employed by District 201.

12. On or around December 17, 2019, Ms. Carter, received an email from the Assistant Principal at Minooka Junior High School stating that she would no longer be allowed to teach at that school for as long as she had family in the building.

13. During the 2019-2020 school year, Plaintiff's children attended Minooka Junior High School (7th grade), Minooka Intermediate School (5th grade) and Jones Elementary School (3rd grade).

14. Upon information and belief, Caucasian teachers and substitute teachers at Minooka Junior High School, as well as other schools in District 201, were allowed to have children or family in the same buildings in which they work.

15. On or about December 19, 2019, Ms. Carter, sent an email to the Superintendent of District 201, detailing her concerns regarding her unfair treatment.

16. On or about January 6, 2020, Ms. Carter, contacted District 201 by telephone and was informed that her name was on a "Do Not Use" list at Minooka Junior High, and two other schools within District 201.

17. Prior to her written complaint in December 2019, Ms. Carter had been in high demand as a substitute teacher and had received only positive feedback regarding her work.

18. Since her written complaint in December 2019, Ms. Carter has received substantial fewer calls for substitute positions within District 201.

19. Upon information and belief, despite performing her job duties in a satisfactory manner, Ms. Carter's name was placed on the "Do Not Use" list in discrimination or retaliation for her complaints regarding the unequal enforcement of certain policies of District 201, resulting in a reduction of her work hours.

20. On or about July 21, 2020, Ms. Carter filed a Charge of Discrimination with the Equal Employment Opportunity Commission ("EEOC"). Said Charge is attached hereto.

21. On or about May 5, 2021, the Department of Justice issued a Right To Sue letter, attached hereto.

COUNT I - Violation of Title VII of the Civil Rights Act of 1964

22. The Plaintiff, Ms. Carter, incorporates and adopts paragraphs 1 through 21 as if set forth herein fully as paragraph 22.

23. At all relevant times, there was in effect in the State of Illinois Title VII of the Civil Rights Act of 1964 (hereinafter “Title VII”).

24. During the course of her employment, the Plaintiff, Ms. Carter, was an “employee” as defined by Title VII.

25. During the course of Plaintiff’s employment, the Defendant was an “employer” as that term is defined by the Act. In particular, the Defendant employed fifteen or more employees for each working day in each of twenty or more calendar weeks, including the Plaintiff, Ms. Carter.

26. The Plaintiff, Ms. Carter, is of African-American race.

27. The Defendant, District 201, by and through its agents and employees, was aware of Ms. Carter’s race.

28. While the Plaintiff, Ms. Carter, was employed by the Defendant, District 201, she satisfactorily performed her duties.

29. Pursuant to Title VII, it is unlawful for an employer to “to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment,” because of the employee’s race.

30. In violation of Title VII, the Defendant, District 201, discriminated against the Plaintiff, Ms. Carter, with respect to her race by non-African American employees more favorably with regards to working conditions and by retaliating against her for her complaints regarding the same.

31. As a result of the discriminatory conduct of the Defendant, District 201, the Plaintiff, Ms. Carter, has sustained the following and ongoing damages:


- a. Loss of wages, benefits, and income and ongoing;
- b. Humiliation, embarrassment, and emotional distress damages and ongoing
- c. Attorneys' fees and costs for the prosecution of this action and ongoing;
- d. Prejudgment interest; and
- e. other losses to be determined.

WHEREFORE, the Plaintiff, ETONIA CARTER, prays for judgment against the Defendant, MINOOKA COMMUNITY CONSOLIDATED SCHOOL DISTRICT 201, plus her costs of suit and attorneys' fees.

JURY DEMAND

A Jury Trial is requested on all claims triable by a jury.

Respectfully Submitted,



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